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## **NREL Guidelines for Preparing a Subcontractor's Health and Safety Plan - NonConstruction**

NREL requires that all activities at the NREL facilities shall be conducted in a manner that minimizes the possibility of personal injury or illness, damage to property, adverse effects on the environment, and program interruption or delay and ensures compliance with all local, state, and Federal standards, laws and regulations. Therefore, all proposed subcontractors who will be performing work at the NREL facilities shall be required to submit a site specific safety plan that addresses environment, safety and health requirements appropriate to the size and hazard level of the work to be performed.

The NREL facilities are Government-owned or leased facilities. While the enforcement provisions of the Occupational Safety and Health Act (OSHA) of 1970 do not apply since the NREL facilities are Government-owned facilities, DOE has exercised its statutory authority to prescribe that all contractors or subcontractors will comply with the OSHA Safety and Health Standards for General Industry (29 CFR 1910) and Construction (29 CFR 1926) and DOE will enforce compliance with these standards. In addition, the subcontractor shall meet the requirements of 10 CFR 851 WORKER SAFETY AND HEALTH.” DOE, NREL, or other authorities having jurisdiction can perform enforcement activities. NREL and its subcontractors are required to comply with all other applicable local, state, and Federal environmental, safety and health (ES&H) standards, laws and regulations applicable to their activities.

The offeror/bidder selected for award of a contractual instrument shall be required to meet the following:

1. Submit an acceptable Subcontractor's Site Specific Safety Plan to the Subcontract Administrator in accordance with this enclosure and the resultant contractual instruments requirements. If the offeror/bidder has been a previous subcontractor to NREL for a similar project, it may reference its previously submitted and accepted safety plan if the plan covers the activities of the current work and is less than three years old. The plan shall be appropriate for the size of the project and hazard level expected. It shall discuss Subcontractor's safety management system. Potential hazards presented by this project and precautions to control those hazards are identified in the Preliminary Hazards Analysis Document included in the Request For Proposal package. The guidelines for preparation of the Subcontractor's Safety Plan are found in Enclosure 1 to this attachment.
2. When selected for subcontract award, submit for approval, prior to beginning work, a list of all hazardous materials to be used on the project to the Subcontract Administrator with copies to the NREL ES&H Office and NREL Project Manager. If requested by any of these three areas at NREL, submit additional information on the Subcontractor's hazard communication program and/or specific Material Safety Data Sheets (MSDS) for materials on the list. The Subcontractor shall also maintain a duplicate list and MSDS file in an easily accessible location on the job site; and update the list and MSDS file as necessary during the course of the project.
3. Attend a post award orientation conference as scheduled by NREL.
4. Designate an employee who is knowledgeable in ES&H requirements as the Subcontractor's safety officer for each job. The Subcontractor's safety officer or site superintendent (based on subcontract agreement) is responsible for assuring that all applicable OSHA, NREL, and other ES&H requirements are fully met.

5. Ensure that all employees of the subcontractor and its lower-tier subcontractors are familiar with the Subcontractor's safety plan, have received required and appropriate ES&H training, and comply with the plan and all applicable ES&H standards.
6. Report immediately to the NREL Project Manager and ES&H POC any employee injuries/illnesses requiring medical attention in excess of first aid, or incidents that result in damage to equipment or facilities.
7. Suspend operations and/or notify the Project Manager if unanticipated conditions are encountered that present a possible ES&H exposure (e.g., imminent danger, suspected hazardous materials, accidental release of hazardous material, possible archaeological sites). Subcontractor must inform all subcontractor workers at all tiers that they have stop work authority when these conditions are encountered. A hazard assessment must be completed and appropriate controls identified to mitigate the identified hazard(s).
8. Provide to the Project Manager quarterly summaries of occupational injuries/illnesses, as specified in the contractual instrument.
9. Provide an easily accessible bulletin board or other suitable information center at the job site, ensuring that employees know its location, and posting the following as a minimum:
  - Emergency telephone numbers
  - Subcontractor's Safety Plan or a location where it may be accessed
  - DOE ES&H poster, Form DOE F-5480.2
  - OSHA summary of occupational injuries/illnesses, if applicable for the time period that subcontract work is performed.
  - Work Authorization Documents (Construction Contractor Safe Work Permit(s), Hot Work Permits, Excavation Permits, etc.)
10. Ensure that proper work practices and engineering controls are used to protect the health of Subcontractor, NREL employees, and Government or NREL property.
11. Furnish necessary personal protective equipment to employees when engineering controls are not feasible or adequate; ensure that necessary training is provided for use of the equipment; and that the equipment is appropriate, properly used, and maintained.
12. Report immediately to the Project Manager, NREL ESH&Q Office, and the Subcontract Administrator any release of material that may affect environmental quality or life.
13. Comply with requirements of the NREL Particulate Emissions Control Plan and the NREL Site-Wide Storm Water Pollution Prevention Plan for the NREL site where the activity is conducted and as applicable to this project. Both documents are included in this Request For Proposal package.
14. Collect, store, and dispose of all construction waste in accordance with applicable laws and regulations. Waste streams that are hazardous or otherwise regulated must be reported to the Project Manager before the waste is generated, and disposal will be coordinated with NREL Safety and Health Office. The Subcontractor will be required to submit a waste management plan to the Subcontract Administrator for approval by NREL before generating these wastes.
15. Implement necessary corrective actions for deficiencies reported by DOE, NREL or other authorities having jurisdiction.

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***Introduction***

The following topics are suggested for inclusion in a subcontractor health and safety plan. Some topics may not be appropriate for inclusion depending on the scope of the individual project. Topics that NREL requires are marked with an asterisk (\*). Additional requirements may be established based on the hazards and scope of work. The health and safety plan must be presented in a written format.

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***Heading  
Information\****

This section should include the following:

- Name of subcontractor/company
  - Effective date of plan
  - Revision date of plan, if any
  - Name and title of person(s) approving “the plan,” approval signatures required.
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***Statement of  
Policy\****

This section should include the following:

- Subcontractor’s policy on environment, safety, and health
  - Specific statement of intent to comply with the Code of Federal Regulations, Title 29, Part 1910, General Industry Safety and Health Standards, 10 CFR 851, Worker Safety and Health, and other applicable codes and standards.
  - Statement that requirements of the safety plan apply to lower-tier subcontractors, if any
  - Statement of employee’s rights and responsibilities regarding a safe and healthful work environment in accordance with the work site occupational safety and health (OSH) poster (Occupational Safety and Health Administration poster, or equivalent).
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**Health and Safety Plan, Continued**

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***Assignment***

This section should include the following:

***of OSH  
Responsibility  
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- Name and title of person responsible for OSH activities at the work site, generally the project superintendent
  - Corporate chain of command for OSH matters
  - Issuance of stop-work authority
  - Point of contact for OSH information.
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***Emergency  
Procedures\****

This section should include the following:

- Emergency notification procedures, including phone numbers
  - First aid and medical information
  - Fire and rescue
  - Other types of emergencies, as appropriate
  - Special arrangements for or with emergency response agencies.
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***Accidents\****

This section should include the following:

- Reporting requirements
  - Accident/Incident Investigation
  - Corrective actions.
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***Hazard  
Analysis***

Process used to identify hazards and implement controls. This should be risk based relative to the project, i.e. small or routine projects. For larger projects having distinct phases with unique hazards, a hazard analysis process must be used to provide adequate controls for each phase.

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This section should include the following:

***Requirements  
and  
Procedures\****

- Access Control
  - Accident Reporting
  - Alcohol and drugs
  - Appropriate work clothing
  - Biological Safety
  - Compressed air equipment
  - Compressed gas cylinders
  - Confined space entry (NREL Confined Space Program)
  - Construction Safety (activities not covered in other sections)
  - Cranes and rigging
  - Electrical systems and equipment
  - Emergency response, first aid, and medical services
  - Fall protection (NREL Fall Protection Program)
  - Fire prevention and response
  - General rules and regulations
  - Hand and power tools
  - Hazard communication
  - Hazardous waste
  - Hazardous work permits (welding, confined space entry, etc)
  - Hearing conservation
  - Heavy equipment operations, including certifications for operators
  - Housekeeping, including lay down areas, as required
  - Industrial hygiene
  - Ladders and scaffolds, includes aerial lifts
  - Lifting
  - Lockout/Tagout (NREL LO/TO Program)
  - Material handling
  - Occupational Health / Medical Monitoring
  - Motor vehicle operations, including posting of site speed limits
  - Nanotechnology
  - Personal protective equipment, includes minimum and special based on specific activities
  - Phase safety plans
  - Powder actuated devices
  - Pressure Safety
  - Radiation protection
  - Signs and barricades, indoors and outdoors, based on project
  - Trenching and excavating, includes discussion of penetration procedures – walls, floors, ceilings, etc, for indoor activities
  - Welding and cutting (NREL Hot Work Permit)
  - Work site postings
  - Workplace Violence Prevention
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- Other safety topics based on scope of work and associated hazards